



Ohio State Emergency Response Commission

Emergency Planning and Community Right-to-Know
P.O. Box 1049, 1800 WaterMark Drive
Columbus, Ohio 43216-1049

Jefferson
"Working to improve statewide preparedness and
response to chemical emergencies and to improve
public awareness of potential chemical hazards."

George V. Voinovich
Governor

CERTIFIED MAIL RETURN RECEIPT

November 12, 1997

Mr. Ara Oztemel, President
SATRA Concentrates Inc.
Oneida Dr.
Greenwich, CT 06830

RE: **Notice of Violations**
EPCRA Reporting Requirements
Facility located at:
C.R. 74 (Goulds Road)
Cross Creek Township
Jefferson County, Ohio

Dear Mr. Oztemel:

It has been brought to the attention of the State Emergency Response Commission (SERC/Ohio EPA) that SATRA Concentrates Inc. has failed from March 1, 1988 to March 1, 1994 to file and/or failed to include all required information on the the annual Facility Identification Form, Emergency and Hazardous Chemical Inventory Form, Facility Map, and Filing Fees as required by Ohio Revised Code (ORC) Chapter 3750 and Ohio Administrative Code (OAC) Chapter 3750 for the referenced facility. The SERC has learned the referenced facility was owned by SATRA Concentrates during this time period and stored or used hazardous chemicals including polychlorinated biphenyl (PCB) oils in quantities exceeding the threshold reporting quantity. To date, the SERC, the LEPC, and the jurisdictional fire department have not received the mandated items.

Currently, SATRA as owners and/or operators of the referenced facility are in violation of the following sections of the ORC and the OAC:

(1) ORC 3750.07 & .08 and OAC 3750-30-10, General Facility Identification Requirements: A facility owner or operator shall annually prepare a Facility Identification Form as prescribed and submit it to the Ohio EPA, the LEPC, and the jurisdictional fire department;

(2) ORC 3750.07 & .08 and OAC 3750-30-20, Emergency and Hazardous Chemical Inventory Form: A facility owner or operator shall annually prepare an Emergency and Hazardous Chemical Inventory Form and Facility Map as prescribed and submit them to the Ohio EPA, the LEPC, and the jurisdictional fire department;

EPA Region 5 Records Ctr.



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(3) ORC 3750.13 and OAC 3750-50-01, Annual Inventory Filing Fees and Form: An owner or operator of a facility shall pay to the SERC an annual inventory filing base fee for the preceding calendar year that must be submitted on or before the first day of March of each year. An owner or operator of a facility that fails to submit the annual inventory filing fee by March 31 of each year shall pay a late fee of 15% of the total fees. Effective July 27, 1991, the late filing fee shall be compounded every three (3) months until the total fees due have been received.

In order to abate **violations (1) & (2)**, you must submit properly completed annual Facility Identification Forms, Emergency and Hazardous Chemical Inventory Forms, and Facility Maps for inventory years 1988 through 1994 to the SERC, the Jefferson County LEPC, and the jurisdictional fire department no later than December 1, 1997. The documents for the SERC should be sent to Ohio EPA, Attn: RTK, 1800 WaterMark Drive, P.O. Box 1049, Columbus, Ohio 43216-1049. The documents for the Jefferson County LEPC should be sent to the attention of Mr. George Starliper, Director, 423 North Street, Steubenville, Ohio 43952. The documents for the jurisdictional fire department should be sent to the fire station that would respond to your facility.

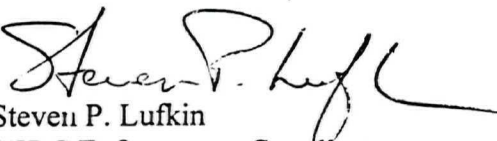
To abate **violation (3)**, a completed Filing Fee Worksheet and a check made payable to the Treasurer, State of Ohio, in the amount of **\$5,191.28** for past fees and late fees must be submitted to Ohio EPA, Department 409, Columbus, Ohio 43265-0409. The worksheet and check must be received by December 1, 1997.

If you choose not to file these statutory required documents and pay all fees owed to the State by the given deadline, we will refer this issue to the Ohio Attorney General's Office for collection and/or enforcement action(s). Section 3750.20 of the ORC provides for a civil penalty of up to \$10,000 for each day of each violation.

Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations. This letter does not relieve Jefferson Processing or Argo Sales, Inc. from liability for any past or present violations of the State's Emergency Planning and Community Right-to-Know Act laws.

Should you have any questions, I can be reached by telephone at (614) 644-2267.

Sincerely;


Steven P. Lufkin
SERC Enforcement Coordinator
Ohio EPA, DERR, CEPU

cc: George Starliper, Jefferson County LEPC
Craig J. Allen Esq., Jefferson County Assistant Prosecuting Attorney
Jonathon Jacobs, Ohio EPA, DERR, SEDO
Mitchell H. Vanchefsky Esq., Attorney for SATRA Concentrates Inc.
SERC File